

FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

2018 JUN -6 PM 2:01

UNITED STATES OF AMERICA,

Plaintiff,
VS.

ROBERT MIKELL USSERY,
aka "Side Thorn" (1) and
JODIE MARIE MANN,
aka "Conspiracy Granny" (2),
Defendants.

§ CRIMINAL NO. SA 18 CR 330
§ BY
§ INDICTMENT
§ Cts 1 and 2: 18 U.S.C. §§922(g)(1)
§ Felon in Possession of a Firearm
§
§ Cts 3 and 4: 18 U.S.C. §§922(g)(1) and 2
§ Felon in Possession of a Firearm and
§ Aiding and Abetting
§

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. §922(g)(1)]

On or about March 5, 2018, in the Western District of Texas, Defendant,

ROBERT MIKELL USSERY, aka "Side Thorn" (1),

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, ammunition and a firearm, to wit: a black and silver semi-automatic striker-fire pistol, caliber unknown, serial number unknown, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO
[18 U.S.C. §922(g)(1)]

On or about May 23, 2018, in the Western District of Texas, Defendant,

ROBERT MIKELL USSERY, aka "Side Thorn" (1),

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, ammunition and firearms, to wit: a Mossberg, Model 500, 12 gauge shotgun, serial number J310149, a Harrington and Richardson,

model 088, 410 caliber shotgun, serial number BA427672, a Smith and Wesson, model M&P 15, 556 caliber rifle, serial number 50683, Serbu Firearms, Model BFG50, 50 BMG caliber rifle, serial number 2001, a Marlin Firearms Co., model 60W, 22 caliber rifle, serial number 10381396, a Hesse Ltd, model HAR-15A2, 223 caliber rifle, serial number 002685, a Taurus International, model PT740 SLIM, 40 pistol, serial number SIT98279, a Taurus International, model PT740 SLIM, 40 caliber pistol, serial number SIS86087, a Taurus International, model PT145 PRO, 45 caliber pistol, serial number NCU70357, a Davis Industries, Derringer, model D9, 9mm pistol, serial number D128874, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE
[18 U.S.C. §§922(g)(1) and 2]

On or about March 5, 2018, in the Western District of Texas, Defendant, **JODIE MARIE MANN, aka “Conspiracy Granny” (2)**, aided and abetted Robert Mikell Ussery, who having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, ammunition and a firearm, to wit: a black and silver semi-automatic striker-fire pistol, caliber unknown, serial number unknown, which had been shipped and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT FOUR
[18 U.S.C. §§922(g)(1) and 2]

On or about May 23, 2018, in the Western District of Texas, Defendant, **JODIE MARIE MANN, aka “Conspiracy Granny” (2)**, aided and abetted Robert Mikell Ussery, who having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate

commerce, ammunition and firearms, to wit: a Mossberg, Model 500, 12 gauge shotgun, serial number J310149, a Harrington and Richardson, model 088, 410 caliber shotgun, serial number BA427672, a Smith and Wesson, model M&P 15, 556 caliber rifle, serial number 50683, Serbu Firearms, Model BFG50, 50 BMG caliber rifle, serial number 2001, a Marlin Firearms Co., model 60W, 22 caliber rifle, serial number 10381396, a Hesse Ltd, model HAR-15A2, 223 caliber rifle, serial number 002685, a Taurus International, model PT740 SLIM, 40 pistol, serial number SIT98279, a Taurus International, model PT740 SLIM, 40 caliber pistol, serial number SIS86087, a Taurus International, model PT145 PRO, 45 caliber pistol, serial number NCU70357, a Davis Industries, Derringer, model D9, 9mm pistol, serial number D128874, which had been shipped and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

As a result of the criminal violations set forth in Counts One through Four, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and 18 U.S.C. § 924, as made applicable to criminal forfeiture by 28 U.S.C. § 2461. Section 924 states in pertinent part:

Title 18 U.S.C. § 924. Penalties

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922, . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

This Notice of Demand for Forfeiture includes, but is not limited to, the following property:

1. Mossberg, Model 500, 12 gauge shotgun, serial number J310149;
2. Harrington and Richardson, model 088, 410 caliber shotgun, serial number BA427672;
3. Smith and Wesson, model M&P 15, 556 caliber rifle, serial number 50683;
4. Serbu Firearms, Model BFG50, 50 BMG caliber rifle, serial number 2001;
5. Marlin Firearms Co., model 60W, 22 caliber rifle, serial number 10381396;

6. Hesse Ltd, model HAR-15A2, 223 caliber rifle, serial number 002685;
7. Taurus International, model PT740 SLIM, 40 pistol, serial number SIT98279;
8. Taurus International, model PT740 SLIM, 40 caliber pistol, serial number SIS86087;
9. Taurus International, model PT145 PRO, 45 caliber pistol, serial number NCU70357;
10. Davis Industries, Derringer, model D9, 9mm pistol, serial number D128874;
11. Any and all firearms, ammunition, and/or firearm accessories involved in or used in the commission of the criminal offense.

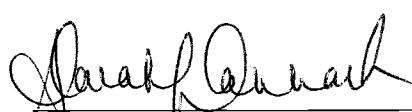
A TRUE BILL



FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY:



SARAH WANNARKA
Assistant United States Attorney